

AFFIDAVIT OF SPECIAL AGENT JENNIFER MORIN

I, Jennifer Morin, Special Agent with the Federal Bureau of Investigation, being duly sworn, depose and state as follows:

INTRODUCTION

1. I have been a Special Agent with the Federal Bureau of Investigation (“FBI”) Since January 2019. Since April 2021, I have been assigned to the Worcester, Massachusetts, Resident Agency of the FBI. As a result of my employment with the FBI, I am a federal law enforcement officer within the meaning of Federal Rule of Criminal Procedure 41(a)(C), that is, a government agent engaged in enforcing the criminal laws and duly authorized by the Attorney General to request a search warrant and make arrests. Since joining the FBI, I have investigated violations of federal law, to include violations of health care fraud and violent crime.

2. Prior to my current role with the FBI, I served as a Commissioned Officer in the United States Army and as a Special Agent with the Defense Security Service of the United States Department of Defense. I am a graduate of the FBI Academy, and I have participated in the drafting and execution of complaints and search warrants during my career. In addition, I have received specialized training and gained experience in interview and interrogation techniques, arrest procedures, search warrant applications, evidence identification and collection, and various other criminal laws and procedures.

PURPOSE OF AFFIDAVIT

3. I make this affidavit in support of an application for a criminal complaint and arrest warrant charging Brandon BROUILLARD (born 1993) of Worcester, Massachusetts with bank fraud, in violation of Title 18, United States Code, Section 1344 (the “Subject Offense”).

4. The facts in this affidavit come from my personal observations, training and experience, and information obtained from other law enforcement agencies and witnesses. I have not included each and every fact known to me concerning this investigation and have set forth only those facts that I believe are necessary to establish probable cause for the requested complaint and arrest warrant.

RELEVANT STATUTE

5. In accordance with Title 18, United States Code, Section 1344, it is a crime to “... knowingly execute, or attempt to execute, a scheme or artifice - (1) to defraud a financial institution; or (2) to obtain any of the moneys, funds, credits, assets, securities, or other property owned by, or under the custody or control of, a financial institution, by means of false or fraudulent pretenses, representations, or promises.”

PROBABLE CAUSE

6. As described below, there is probable cause to believe that BROUILLARD attempted to fraudulently use a bank account belonging to Victim 1 held at Alerus Bank, a federally insured financial institution, to purchase a high-end sports car.¹

7. On April 17, 2021, BROUILLARD arrived at the Boch Chevrolet dealership in Norwood, Massachusetts to test drive a 2021 Chevrolet Camaro. After test-driving the Camaro, BROUILLARD agreed to purchase it for \$83,000. BROUILLARD provided a “Charles Schwab Brokerage Services LLC Cashier’s Check” in the amount of \$83,000 made out to Boch Chevrolet as payment for the Camaro. BROUILLARD also provided his Massachusetts driver’s

¹ I know the identity of Victim 1 but omit it to protect Victim 1’s privacy.

license, provided proof of insurance, and signed a sales contract and Massachusetts application for registration and car title in connection with the purchase.²

8. Two days later, on April 19, 2021, BROUILLARD picked up the Camaro from Boch Chevrolet after the dealership had titled and registered the vehicle with the Massachusetts Registry of Motor Vehicles.

9. On April 23, 2021, Boch Chevrolet learned from Charles Schwab that the account listed on the bank check was frozen and funds were not available. That same day, Boch Chevrolet contacted BROUILLARD, who promised that he would wire \$83,000 to Boch Chevrolet to pay for the car.³

10. On April 26, 2021, Victim 1 contacted the Norwood Police Department and reported an attempted fraudulent wire of \$83,000 from Victim 1's bank account. Victim 1 also spoke with the Scottsdale, Arizona Police (where Victim 1 has a residence) about the incident. Victim 1 reported that an individual, presumably BROUILLARD, had logged into Victim 1's email account and sent an email on April 26, 2021 to Victim 1's bank, Alerus Bank, located in Arizona and requested a wire transfer of \$83,000 to pay for Victim 1's "brother-in-law's car."

11. Alerus Bank then reached out to Victim 1 to verify the transfer. Victim 1 advised Alerus Bank that Victim 1 "had no idea what they were talking about" and "not to approve it."

² The address listed on BROUILLARD's Massachusetts Driver's License is on Forkey Avenue in Worcester, Massachusetts. The same address also appears on the Massachusetts application for registration and car title and Sales Contract that BROUILLARD provided to Boch Chevrolet.

³ On April 24, 2021, Boch Chevrolet repossessed the 2021 Chevrolet Camaro from BROUILLARD's Worcester address, but as explained below, BROUILLARD continued attempting to fraudulently purchase the Camaro after April 24.

Victim 1 obtained a copy of the email sent from Victim 1's email account requesting the wire, which Victim 1 in turn provided to me.

12. Victim 1 said that starting in about approximately September/October 2020, Victim 1's accounts have been compromised to make large purchases including appliances that have been shipped to BROUILLARD's address in Worcester. Victim 1 specifically recalled the Forkey Avenue address as the destination for the fraudulently-obtained items. Victim 1 estimated that approximately \$500,000 of Victim 1's funds have been used to purchase such items.

13. In addition to contacting the police, Victim 1 also called Boch Chevrolet and advised them that the wire transfer for \$83,000 was fraudulent and not to accept it. Nevertheless, BROUILLARD contacted Boch Chevrolet through at least April 29, 2021 to inquire about the status of the wire.

[CONTINUED ON NEXT PAGE]

CONCLUSION

14. Based on the foregoing, there is probable cause to believe that BROUILLARD has committed the Subject Offense and I respectfully request that the Court issue a criminal complaint and arrest warrant.

Sworn to under the pains and penalties of perjury,

/s/ Jennifer Morin

Special Agent Jennifer Morin

Time and Date: **5/19/2021; 1:55 p.m.**

Notice is hereby provided that, pursuant to Federal Rule of Criminal Procedure 4.1, the affiant was sworn by telephone on the date and time indicated above.

The block contains a handwritten signature in blue ink that reads "Marianne B. Bowler USMJ". Below the signature is a circular official seal of the United States District Court for the District of Columbia. The seal features an eagle with a shield, holding an olive branch and arrows, with a constellation of stars above its head. The text "UNITED STATES DISTRICT COURT" is inscribed around the perimeter of the seal. Below the seal, the text "HON. MARIANNE B. BOWLER" and "United States Magistrate Judge" is printed.

HON. MARIANNE B. BOWLER
United States Magistrate Judge